A Report
to the
Board of
Supervisors

Elections Department

Strong controls exist over election processes

December ■ 2007

*Maricopa County
Internal Audit
Department*

Ross L. Tate
County Auditor

The mission of Maricopa County is to provide regional leadership and fiscally responsible, necessary public services so that residents can enjoy living in a healthy and safe community.

The mission of the Internal Audit Department is to provide objective, accurate, and meaningful information about County operations so the Board of Supervisors can make informed decisions to better serve County citizens.

The County Auditor reports directly to the Maricopa County Board of Supervisors, with an advisory reporting relationship to the Citizen's Audit Advisory Committee.

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December 26, 2007

Fulton Brock, Chairman, Board of Supervisors
Don Stapley, Supervisor, District II
Andrew Kunasek, Supervisor, District III
Max Wilson, Supervisor, District IV
Mary Rose Wilcox, Supervisor, District V

We completed our review of the Maricopa County Elections Department (Elections) in accordance with the annual audit plan approved by the Board of Supervisors. The specific areas reviewed were selected through a formal risk-assessment process.

Highlights of this report include the following:

- Voter registration process controls are sufficient to prevent abuse

- Voting equipment tabulates ballots accurately

- Ballots are accurately printed, counted, and appropriately secured

Within this report, you will find an executive summary, specific information on the areas reviewed, and Elections' response to our recommendations. We have reviewed this information with the Director and appreciate the excellent cooperation provided by management and staff members. If you have any questions, or wish to discuss the information presented in this report, please contact Richard Chard at 506-7539.

Sincerely,

Ross L. Tate
County Auditor

Executive Summary

Voter Registration (Page 8)

Elections Department (Elections) has good controls over maintaining the County's voter registration list. However, our review of 94 duplicate County registration records returned 13 records (14%) that should have been removed from the County's database. Citizens registered to vote in two Arizona counties have the ability to cast a ballot in each county, which is a felony. Management should remove duplicate records from the Voter Registration Database in accordance with State-established guidelines.

Voting Equipment (Page 11)

Elections' voting equipment is reliable and tabulates election results accurately. Elections performed required tests on the equipment prior to all elections, and the Arizona Secretary of State certified the voting equipment in accordance with State and Federal requirements.

Ballot Tabulation (Page 13)

Elections accurately prints, stores, distributes, collects, counts, and secures ballots. However, controls could be strengthened within the early ballot tabulation process. Elections does not reexamine good early ballot signatures, which may generate inaccurate election results. Management should periodically verify that employees properly analyze signatures to ensure that ballots are accurately tabulated.

Introduction

Background

The Maricopa County Elections Department (Elections) was created in November 1955 by a resolution passed by the Board of Supervisors (Board). The resolution states that Elections will cooperate with the Clerk of the Board in fulfilling the Board's legal responsibilities relating to elections, and will represent the County Recorder's office in conducting elections. Elections is responsible for the planning, organization, execution, and reporting of countywide and jurisdictional elections held in Maricopa County. Arizona Revised Statutes (ARS) Title 16, Title 19, and numerous Federal Acts regulate Elections' operations.

Mission, Goals, and Performance Measures

The mission of the Elections Department is to provide access to the electoral process for citizens and candidates so that they have equal access and may readily participate in elections. To support the department's mission, Elections' management developed ten key performance measures and four strategic goals.

- By September 30, 2008, increase the percentage of early votes to 55% as compared to 49.1% from the November 2006 General Election

- By November 4, 2008, reduce the number of candidates fined to less than 10% of total filings

- By November 30, 2008, reduce the ratio of provisional ballots to total ballots cast by 10% as compared to the 4.95% from the November 2006 General Election

- By November 30, 2008, increase voter satisfaction with ease of voting by 20% compared to the November 2006 General Election

Volunteers place signs such as this one at polling sites for jurisdictional and countywide elections

<u>Organizational Structure</u>

The Elections Department is budgeted 58 full-time positions. The positions are allocated across three programs: Voter Registration, Elections, and Administrative Services. Some staff members perform administrative and Information Systems support for both the County Recorder and the Elections Department. The following chart illustrates the organizational layout and programs of Elections.

County Recorder

Director of Elections

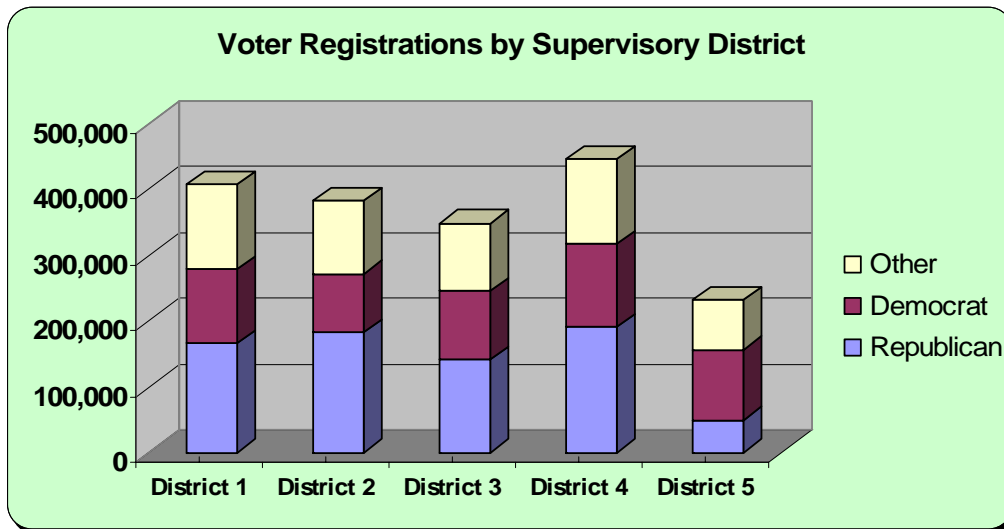| Voter Registration | Elections | Administrative Services |
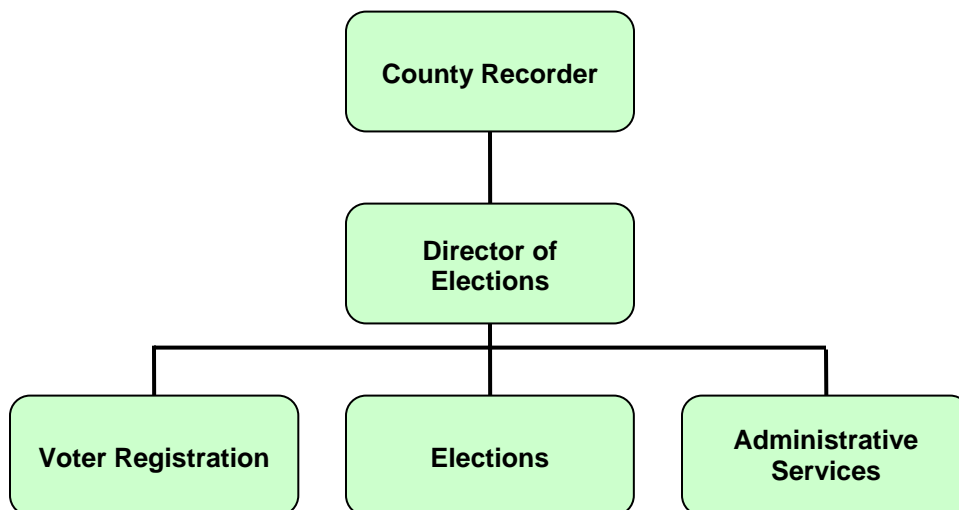
Operating Budget

Elections' operating budget varies substantially from year to year. Countywide election years, which include primary and general elections, draw considerably more resources than years when only jurisdictional elections are held. Elections is largely funded by the County's general fund. The following table illustrates the cyclical nature of Elections' operating budget over the past three fiscal years.

Elections Operating Budget FY05 - FY07

Fiscal Years

■ Revenues
■ Expenditures
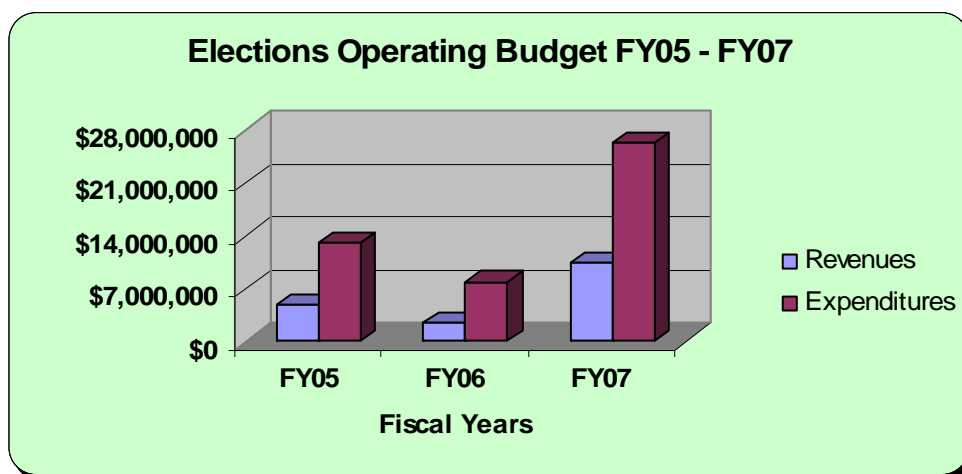
**Source: Advantage Downloads, FY05 - FY07**

Program Operations

Voter Registration: Maricopa County maintains over 1.8 million active and inactive voter registration records in the Voter Registration Automation System (VRAS). Citizens can submit voter registration applications through the Arizona Motor Vehicle Division (MVD), public assistance agencies, armed forces recruitment offices, and private voter registration drives. The following chart compares the number of active and inactive voter registrations on record by Board of Supervisor district as of November 2007.

Voter Registrations by Supervisory District

Source: Elections' Official Website

Proposition 200: In 2004, Arizona voters approved legislation that requires proof of United States citizenship to register to vote in Arizona. Maricopa County's Voter Registration application informs citizens of the citizenship verification requirement in several places throughout the application. Proof of citizenship is most commonly achieved when a citizen submits their Arizona Driver's License number with their application, or registers through MVD. The chart below reveals that the percentage of applications accepted as well as the percentage of applications submitted through the MVD realized a sudden influx in the two years leading up to Proposition 200's implementation.

Voter Registration History Nov 1994 - Nov 2006
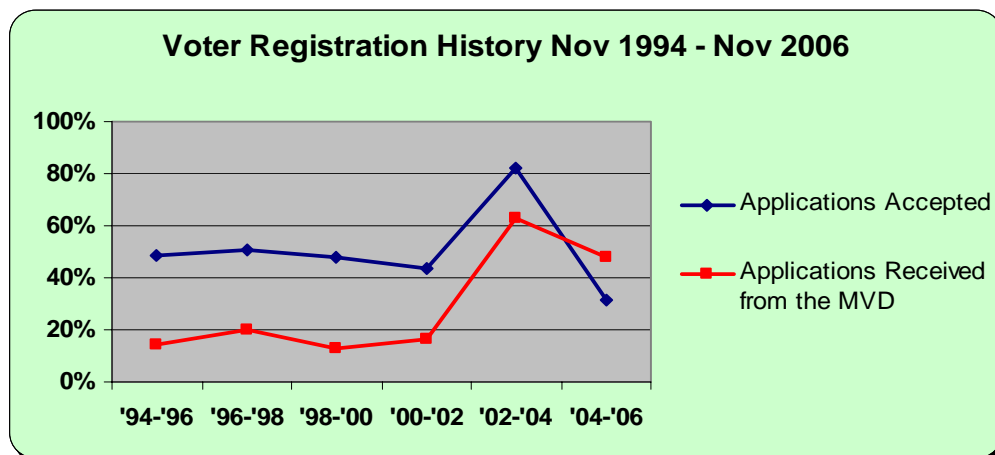
Source: National Voter Registration Act Reports, 1994-2006

Immediately following Proposition 200's implementation in January 2005, the percentage of applications accepted dropped to the lowest levels over the 10-year period. According to Elections' management, proof of citizenship was not required for voter registration prior to the implementation of Proposition 200. Elections promotes citizenship validation by displaying signs in front of each polling place, informing citizens of the requirement prior to entering the site. Additionally, the Elections' Board Worker Training Manual requires Election Board workers to verify identification before a citizen can vote. If the information does not match, or the individual cannot provide valid proof of identification, the individual can still vote using a provisional ballot.
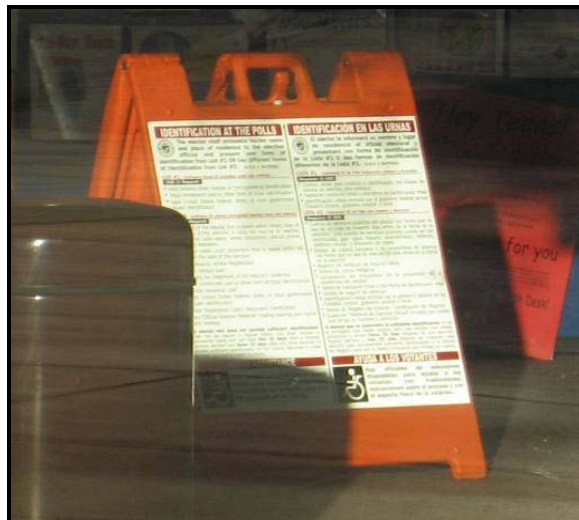
A sign placed at the entrance to a polling site informs citizens that valid forms of identification are required to cast a non-provisional ballot

Elections: Elections' employees administer jurisdictional elections throughout Maricopa County, including fire districts, school districts, and community college districts. Elections' employees also administer municipal elections for those cities and towns within Maricopa County, except for the City of Phoenix. Elections operates on a four-year election cycle, holding countywide primary and general elections every two years, and holding a countywide Presidential Preference election every four years.

Maricopa County's 4-year Election Cycle						
Cycle Year	Primary Election (Presidential)	General Election (Presidential)	Primary Election (State)	General Election (State)	Presidential Preference	Jurisdictional Election
FY05-06	N/A	N/A	N/A	N/A	N/A	Sep, Nov, Mar, May
FY06-07	N/A	N/A	**SEP**	**NOV**	N/A	Mar, May
FY07-08	N/A	N/A	N/A	N/A	**FEB**	Sep, Nov, Mar, May
FY08-09	**SEP**	**NOV**	N/A	N/A	N/A	Mar, May

Scope and Methodology

<u>Audit Objectives</u>

The objectives of this audit were to determine if:

- Results of County-administered elections are reliable and accurate

- Ballots are accurately printed, stored, distributed, collected, counted, and secured

- Controls are adequate to ensure that only eligible citizens register to vote

- County voting machines tabulate votes accurately and reliably

An examination of department-reported performance measures was conducted. Results will be reported in a separate county-wide performance measure certification report later this year.

<u>Audit Timeframe</u>

Data from the following fiscal years were used in conducting this audit: 2006, 2007, and the first quarter of 2008.

<u>Auditing Standards</u>

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Department Reported Accomplishments

Elections Department Management has provided the Internal Audit Department with the following information for inclusion in this report.

- Created and executed new citizenship and identification requirement procedures
- Expanded voter accessibility to information and the process by adding touch screen voting machines at the polls
- Redesigned voting precincts saving the County more than $480,000 in costs
- Implemented post-election hand audit
- Negotiated successfully with USPS for mailing classifications saving the County in excess of $5 million
- Enhanced security at the Ballot Tabulation Center (MCTEC) to include online viewing of eight cameras
- Hosted the 2007 Native American Voter Outreach Summit
- 96% of voters completing a voter assistance survey at the polls on Election Day were "Satisfied with the ease of voting"
- Implemented the Permanent Early Voting List
- Improved the waiting time at the Early Voting Satellite Sites
- Implemented the "STEP – up" program of hiring 16 and 17 year-olds to work the polls on Election Day
- Made available campaign finance on line for all candidates and political action committees
- Continued diligence in maintenance of an accurate voter list when 30% of our voters move each year

AWARDS:
- **Military and Overseas Voter Project** received the 2005 NACo Achievement Award
- **Boardworker Voter Assistance Enhancement Training** received the 2005 NACo Achievement Award
- **Voter Language Assistance Proficiency Assurance Program** received the 2006 NACo Achievement Award & 2006 NACo Best of Category for County Management
- **Early Voting Ballot Affidavit Signature Verification** received the 2007 NACo Achievement Award
- **Election Reporting Database** received the 2007 NACo Achievement Award, the 2007 Election Center Best Professional Practice, and the 2007 NACRC Professional Practice

REPRESENTATION:
- Management team members represent Maricopa County on the national stage:
  - Election Assistance Commission's Technical Guidelines Development Committee (TGDC) Advisory Board and the Standards Board for the development of the Voluntary Voting Systems Guidelines
  - Election Assistance Commission's Working Group on Unwritten Languages
  - Election Center Task Force on Training & Education
  - Election Center Legislative Committee
- Management team members also represent Maricopa County on a number of statewide committees:
  - Voter Registration Arizona (VRAZ) Advisory Committee
  - Vote Count Verification Committee
  - Wait Time Study Committee
- Management team members represent Maricopa County on the local level:
  - Hosts the monthly Community Network
  - Maricopa County Civic Participation Group

Issue 1 Voter Registration

Summary

Elections Department (Elections) has good controls over maintaining the County's voter registration list. However, our review of 94 duplicate County registration records returned 13 records (14%) that should have been removed from the County's database. Citizens registered to vote in two Arizona counties have the ability to cast a ballot in each county, which is a felony. Management should remove duplicate records from the Voter Registration Database in accordance with State-established guidelines.

Criteria

The Federal Help America Vote Act of 2002 (HAVA) requires each state to develop a comprehensive statewide voter registration database.

According to the Arizona Secretary of State Election Procedures Manual (2006 ed.), if a citizen moves from one Arizona county to another, it is the responsibility of the prior Arizona county to resolve the duplicate record and update their database when any of the following conditions apply:

1. *Complete Match* - The name, date of birth (DOB), driver's license number (DLN), and Social Security number match

2. *Strong Match* - The name, DOB, and DLN match, but no Social Security number is provided on the form, *or* the name, DOB, and Social Security number match, but no DLN is provided on the form

Condition

The Voter Registration list has strong controls in terms of entering, removing, and modifying records in the County's Voter Registration Automation System (VRAS). Each day, Elections' management uploads and transmits the VRAS database to the Office of the Secretary of State to check the status of existing registrations and to validate new registration applications. The Office of the Secretary of State checks the data against State and Federal agency databases.

Type of Database	Purpose of Database
Arizona Motor Vehicle Division	To verify citizenship and check for duplicate registrations
Vital Records	To ensure the information provided is not that of a deceased citizen
Court Records	To ensure applicants are not felons or declared mentally incompetent
Social Security Administration (SSA)	To ensure the Social Security number on the application matches SSA records
Statewide Voter Registration Database	To ensure the citizen is not already registered in another Arizona county

A complete match between the State and County databases would indicate the name, driver's license number, date of birth, and Social Security number agree to the database searches. The State's database generates a report (known as the VRAZ Daily Report) based on the search, and then transmits the report back to Maricopa County. We selected a sample of 136 records from these daily reports from July 5, 2006 to July 25, 2007. The composition of our sample included the following record types.

Record Type	Number of Records Sampled	Expected Disposition	Exceptions Noted
Complete or Strong Match	16	Added to VRAS	No Exceptions
Duplicate County [1]	94	Removed from VRAS	13 Exceptions (14% error rate)
Felon	11	Removed from VRAS	No Exceptions
Mentally Incapacitated	4	Removed from VRAS	No Exceptions
Death	8	Removed from VRAS	No Exceptions
Misc. Scenarios	3	Various	No Exceptions
Total Reviewed	136		

[1] "Duplicate County" indicates that a citizen moved out of Maricopa County to another Arizona county and re-registered to vote. These records should be removed from Maricopa County's voter registration list upon receipt.

Our test revealed that 13 of the 94 duplicate County records (14%) should have been removed from VRAS. Eight of the 13 records were complete matches and the remaining five were strong matches, as defined by the Arizona Secretary of State Election Procedures Manual. Of the exceptions noted, however, we did not find any examples of citizens voting in multiple Arizona counties in the same election. By department policy, only records that are complete matches are immediately removed. Elections' staff members send a letter to those citizens that appear as strong matches in the VRAZ Daily Reports. If citizens don't respond to the letter, they are not removed from the registration list; however, their registration status is changed from active to inactive.

Effect

Citizens registered to vote in two Arizona counties have the ability to cast a ballot in each county. However, should a citizen attempt to vote in each county, they could be charged with a felony.

Cause

Elections does not follow established guidelines to remove citizens with more current registrations in other Arizona counties as required by the Arizona Secretary of State Election Procedures Manual. The removal of records from the County's registration list is labor intensive; the volume of records received each day may contribute to the error rate.

Recommendation

Elections' management should remove duplicate records categorized as complete or strong matches from VRAS in accordance with VRAZ Daily Reports and the Arizona Secretary of State Election Procedures Manual.

Issue 2 Voting Equipment

Summary

Elections' voting equipment is reliable and tabulates election results accurately. Elections performed required tests on the equipment prior to all elections, and the Arizona Secretary of State certified the voting equipment in accordance with State and Federal requirements.

Criteria

Arizona Revised Statute (ARS) 16-442 requires the Secretary of State (SOS) to appoint a committee to investigate and test voting machines, including hardware and software, used in elections held throughout Arizona. Based on the committee's recommendations, the SOS certifies the types or models of voting machines for use in Arizona. Any voting machine selected for use in Arizona elections for Federal, State, or County offices must also comply with the Federal Help America Vote Act of 2002 (HAVA).

Per ARS 16-449, voting machines, including hardware and software, used in Maricopa County elections involving State or Federal candidates, must be tested for accuracy and functionality using logic and accuracy tests performed by SOS employees. Elections' employees perform logic and accuracy tests on voting machines used in countywide and jurisdictional elections held in Maricopa County. Logic and accuracy tests are conducted by processing a pre-audited set of test ballots through voting machines and comparing actual results to expected results.

Finally, ARS 16-452 authorizes the SOS to prescribe rules to govern the conduct of elections throughout the State. These rules are contained in the Arizona Secretary of State Election Procedures Manual. In addition, Elections issued an Election Boardworker Training Manual prescribing rules that boardworkers must adhere to at polling places.

Condition

HAVA mandates that each of Maricopa County's 1,142 precincts have an optical scanning voting system as well as a direct recording electronic system on-site for each election for federal office. To assist in the early voting process, Elections purchased eight Optech 400-C voting machines. The Optech 400-Cs are high-speed optical scanning voting machines used to count large volumes of early ballots. Elections also purchased Edge II touch screen voting machines to comply with HAVA; these machines aid disabled voters in casting their ballots. Software contained in the Edge II memory cartridges provides an audit trail to record votes. The Edge II prints a paper record that permits disabled voters to review their voting selections before the ballot is tabulated. In addition, Elections purchased Insight voting machines, also to comply with HAVA. Insight voting machines use optical scanners to electronically record votes. Software contained in the Insight memory packs provides an audit trail to record votes. In addition, a paper tape printed by the Insight machine provides an alternative audit trail to record votes.

We observed successful logic and accuracy testing performed on Optech 400-C, Edge II, and Insight voting machines by Elections employees. These tests help to ensure that voting machines, including hardware and software, used in Maricopa County elections correctly tabulate ballots, as required by ARS.

We observed post-election procedures associated with closing polls. We also observed the processing and transfer of ballots and other election materials from the polling place to the receiving site and to Elections' Maricopa County Tabulation Election Center (MCTEC) facility. Finally, we observed recorded voter totals for the election at one of the polling places.

Voting machines purchased by Elections for the 2006 General Election complied with required logic and accuracy tests. These tests were designed to ensure that all voting equipment, including hardware and software, will correctly tabulate ballots. Documentation obtained from the SOS confirmed that voting machines purchased by Elections successfully met the testing requirements.

An Insight Voting machine is prepared at a polling site the evening before an election

Voting machines purchased by Elections for use at any election for Federal, State, or County offices complied with the requirements of ARS and HAVA. In addition, SOS certified the machines based on the appointed committee's recommendation.

Recommendation

None, for information only.

Issue 3 Ballot Tabulation

Summary

Elections accurately prints, stores, distributes, collects, counts, and secures ballots. However, controls could be strengthened within the early ballot tabulation process. Elections does not reexamine good early ballot signatures, which may generate inaccurate election results. Management should periodically verify that employees properly analyze signatures to ensure that ballots are accurately tabulated.

Criteria

Arizona Revised Statutes (ARS) 16-542, 16-579, and 16-246 describe the early voting process whereby a voter may obtain an early ballot.

ARS 16-550 mandates the early ballot signature comparison process used to determine whether early ballots will be approved and tabulated. The Arizona Office of the Secretary of State (SOS) issues the Arizona Secretary of State Election Procedures Manual, which describes early balloting procedures in detail.

Condition

Maricopa County has 1,142 voting precincts. Because of the multitude of jurisdictions, e.g., community college districts, elementary school districts, fire districts, high school districts, unified school districts, etc., included within these precincts, ballot styles for countywide primary and general elections exceed 7,000. Elections maintains a Geographic Information Systems (GIS) Unit which, with Federal Department of Justice pre-approval, establishes and maintains maps that delineate the boundaries associated with various precincts and their associated jurisdictions.

Ballot Printing, Storage, Distribution, Collection, and Security

Elections contracted with a printing company to print all ballots used in County elections. Within Elections' MCTEC facility, we observed that printed ballots were secured in a locked cage prior to Election Day distribution to polling places. In addition, Elections maintained a database of the various jurisdictions to ensure that precincts and their respective polling places obtain the proper ballots and distribute them to the proper voters based on residential addresses.

At the polling places, board workers carefully monitored ballots. We observed that:

- Inspectors and judges verified the number of ballots initially received

- Board workers performed post-election reconciliations to ensure the number of voted and un-voted ballots balanced to the total number of ballots initially received

- Provisional and early ballots were secured in separate sealed boxes and other voted ballots were secured in sealed bags after the election

- Ballots were secured in a locked cage once voted ballots were transferred from the polling place to Elections' MCTEC facility

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Following a federal election, Elections transfers voted ballots to the County Treasurer's vault where they remain for 24 months. Parties interested in reviewing election material stored in the Treasurer's vault must obtain a court order. After jurisdictional and municipal elections, Elections transfers voted ballots to the election officers at the respective jurisdictions or municipalities. These transfers were substantiated by documentation.

Early Voting Process

The early voting process allows voters to request early ballots up to 90 days prior to the next election for which they are eligible to vote. To be eligible to vote, a prospective voter must register to vote at least 29 days before the election. Early voting begins 33 days before the election and ends 11 days before the election. However, a registered voter who appears in person no later than 5:00 pm on the Friday preceding the election at an on-site early voting location will be permitted to vote.

Voters who have fulfilled all legal requirements may request early ballots. Upon receiving a valid request, Elections' vendor mails an early ballot and a return envelope to the voter; we observed the vendor processing early ballot envelopes prior to mailing them out to voters. The voter completes the ballot, places it in the return envelope, signs his or her name in the affidavit area of the return envelope, and mails the return envelope containing the early ballot back to Elections. Elections transports completed ballots and corresponding returned envelopes to the aforementioned vendor for processing. While completed ballots are processed at the vendor's location, Elections provides additional 24 hour security to that location for as long as the ballots remain.

The vendor gathers all early ballots and corresponding returned envelopes and separates those returned envelopes with affidavits lacking signatures and those returned envelopes marked to indicate that the enclosed ballot is spoiled. The vendor then electronically scans voters' signatures on the affidavit area and transfers ballots and corresponding returned envelopes back to Elections. In addition, the vendor electronically transmits the scanned signatures from the affidavit area of the returned envelopes via a Virtual Private Network (VPN) to Elections. Elections' employees monitor all ballot processing and scanning performed by the vendor.

The number of early ballots cast as a percentage of total ballots cast has more than doubled for countywide elections over a 10-year period	**Early Ballots Cast as a Percentage of Total Ballots Cast 1996 - 2006** (Data provided by Elections)
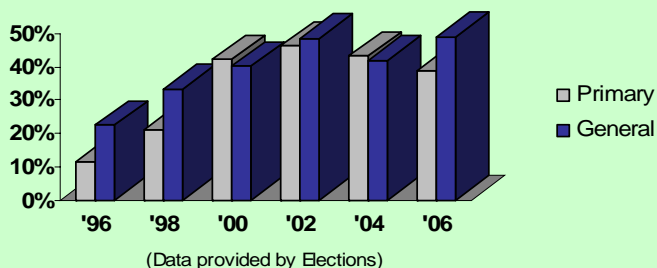
Elections validates early ballots completed by voters who have met all legal voting requirements and that they signed the affidavits. Elections compares signatures on affidavits resulting from early ballots to electronically scanned signatures from voter registration documentation.

- Signatures on affidavits that match signatures on corresponding voter registration documentation are classified as good. However, the good signature affidavits do not receive additional reviews. Elections tabulates these ballots with the good signatures.

- Signatures on affidavits that do not match signatures on corresponding voter registration documentation are classified as bad and the associated ballots are not tabulated. The bad signature affidavits are subsequently reviewed.

- Affidavits with no signatures and their corresponding ballots are not tabulated.

Signature comparisons between affidavits and voter registrations documentation enables Elections to fulfill a critical requirement of any legal and properly conducted election, i.e., only legitimate ballots should be counted and included in the election results.

In the 2006 General election, voters cast approximately 441,668 early ballots; 856 signatures displayed on early ballot affidavits were classified as bad. Ballots corresponding to these affidavits were not tabulated. In the same election, affidavits with no signatures numbered 2,171; ballots corresponding to these affidavits also were not tabulated.

We tested the flow of affidavit signatures by sampling affidavit numbers from Elections' Audit Tray Reports from the 2006 Primary and General elections. Our sample included affidavit numbers that were sent to the tabulation center (indicating a good signature), and those which were not tabulated (indicating a bad or missing signature). Our test revealed that Elections' staff reviewed each affidavit prior to its disposition in accordance with statute. Our sample composition and test results are highlighted in the following table.

Summary of Signature Verification Test Results		
2006 Elections	# of Records Reviewed	# of Exceptions per Record Type
Primary Good Signatures	8	0
Primary Bad Signatures	5	0
General Good Signatures	32	0
General Bad Signatures	5	0
Totals	**50**	**0**

Effect

If any affidavit signatures on early ballots are mistakenly classified as good and the ballots are tabulated, election results may be inaccurate.

Cause

Once an affidavit and corresponding early ballot initially are classified as good, Elections does not reexamine the classification.

Recommendation

Elections' management should periodically verify that first line employees properly analyze handwritten signatures to ensure that ballots are accurately tabulated.

Department Response

Issue #1:
Citizens with active voter registrations in more than one Arizona County have the ability to cast multiple ballots. Duplicate records are not removed from the Voter Registration Database.

Response: Partially Do Not Concur. The issue at hand rises out of the misinterpretation of the data presented and the definition of a "match". The fact is that "Complete" and "Strong" matches are manually removed from the voter registration database in accordance with the Arizona Secretary of State Election Procedures Manual. The issue is that the VRAZ Daily Report that is provided to our department has a mix of Complete, Strong and Possible duplicates. Staff reviews this data to remove "Complete" and "Strong" duplicates but we currently do not automatically remove "Possible" duplicates. Of the exceptions noted, there were records that had characteristics of a "Strong Match" but in fact 10 were not. They matched in name, DOB and had a DLN number provided but the other county record only had the Social Security number or vice versa. Although the Name, DOB, DLN and Social Security were provided, there was no way to match the DLN or SSN to anything on file therefore these would not be considered "Strong" matches. Removal of such records would have the unintended effect of disenfranchising the voter who may not be an actual duplicate voter.

Recommendation: Remove duplicate records categorized as complete or strong matches from VRAS in accordance with VRAZ Daily Reports and the Arizona Secretary of State Election Procedures Manual.

Response: Concur—in process. The current method requires manual verification by a staff member of "Complete", "Strong" or "Possible" matches and because of this, the process is delayed. We are hoping to implement, within the next six months, a systematic way of updating "Complete" and "Strong" matches based on the parameters established by the Arizona Secretary of State Election Procedures Manual. Such matches will subsequently be processed automatically. Therefore, the only matches that will be delayed are those that are deemed "Possible" matches. We will implement a procedure for those "Possible" matches that would allow us to contact the out-of-county entity to request a signature copy of the form so that we can ascertain if indeed the "Possible" duplication is a true match or not, using the signature as the verification tool. Our main goal is to maintain the integrity of the voter registration file without disenfranchising any voter that is eligible to participate in the electoral process.

Target Completion Date: 05/01/08

Benefits/Costs: Increases production by allowing for staff members to dedicate their time to the particular process that does require manual review. The records that are received as true Complete & Strong matches will be systematically handled therefore allowing staff the ability to focus their resources towards the true "Possible" duplications.

Issue #2:
Required tests on voting equipment prior to all elections are performed. The Arizona Secretary of State certified the voting equipment in accordance with State and Federal requirements.

Response: Concur

Recommendation: None. For information only.

Issue #3:
Controls could be strengthened within the early ballot tabulation process. Some early ballots could be tabulated when they should have been rejected.

Response: Concur. The signature verification process does allow for a staff member of the Elections Department to possibly assign a "Good Signature" disposition to a voters packet without a second check validation. Currently, a staff member is unable to assign a disposition that would **invalidate** a packet without a second review of this occurrence. We believe it to be a legitimate request that the disposition of "Good Signature" should also be held to a similar standard. This is not intended to infer that we previously did not hold our staff to a high standard through training, certification and legal accountability through their signed and sworn loyalty oath. The addition of this new procedure is instead designed to enhance the accountability of the process itself.

Recommendation: Verify periodically that first line employees properly analyze handwritten signatures to ensure that ballots are accurately tabulated.

Response: Concur—in process. We have begun the effort to create a systematic way of randomly pulling, for review, 1% of the early ballot records that are assigned a "Good Signature" status. These random records will be presented to an upper management staff member who is accredited and certified to do this review. Each primary record reviewed by a first line employee has a User ID assigned to it and through this secondary management review, we will be able to ascertain if indeed a given staff member is correctly assigning a "Good Signature" status. We have selected the 1% margin for review since it is so established by Arizona Revised Statutes [A.R.S. § 16-602(C), (G), -663(B)] that this 1% is a sufficient sampling of early ballots to the determine validity of the tabulation equipment. Using this same standard, we believe this percentage will also produce a sufficient sampling that will allow us to validate and ensure the integrity of the "Good Signature" records, as proposed.

Target Completion Date: 08/07/08 < *first day that Early Voting can begin for the Primary Election, 2008*

Benefits/Costs: The benefits to implementing this new process are that all validations (good, bad or otherwise) are run through a second check to ensure the integrity of the procedure as a whole. There is an increased cost (staff hours) for this newly implemented process but the benefits of such can outweigh the cost based on the fact that this improves upon the accountability and validity of the entire process.
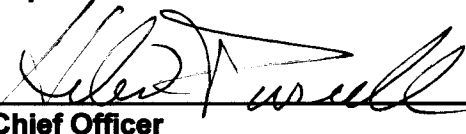
Approved By: _Karen Osborne_   _12-24-07_
                 Department Head   **Date**

                 _____   _12-24-07_
                 Chief Officer   **Date**